

IN THE UNITED STATES DISTRICT COURT
FOR THE MIDDLE DISTRICT OF ALABAMA
NORTHERN DIVISION

SONIA R. HAMMOCK,	§	
	§	
Plaintiffs,	§	
	§	
	§	
v.	§	CIVIL ACTION NO.
	§	07-CV-00896-WHA-TFM
NELL E. LAMB and TODD SWING,	§	
et al.,	§	
	§	
Defendants.	§	

RE-NOTICE TO TAKE DEPOSITION

Please take notice that the Plaintiff will take the following deposition at the time and place set out below, before a duly authorized court reporter and notary public. You are invited to attend and cross examine if you so desire.

DEPONENT: NELL E. LAMB

DATE: January 19, 2008

TIME: 1:00 P.M.

LOCATION: LAW OFFICES OF BRADFORD & SEARS, PC
2020 Canyon Road
Suite 100
Birmingham, AL 35216

Deponent is asked to provide the following documents on or before this deposition:

1. Clear copies of all licenses held by you including, but not limited to, driver's license, professional licenses, hunting licenses, fishing licenses and firearm permits from November 23,

2005 through September 24, 2007.

2. All tax returns including federal, state, 1099s and W2s, for 2005, 2006 and 2007.

3. Written evidence of your voter registration from November 23, 2005 through September 24, 2007.

4. Records of all vehicle registrations and certificates of title for any vehicles you or a member of your family owned between November 23, 2005 and September 24, 2007.

5. Records of any charitable contributions you made between November 23, 2005 and September 24, 2007, including, but not limited to, any offering or donations to any church, civic club or social organization.

6. Copies of all evidence of ownership of property you have owned between November 23, 2005 and September 24, 2007, including but not limited to deeds, mortgages and payment of property taxes.

7. Copies of all bills and correspondence you received, including, but not limited to, utility bills (including water, garbage, sewer, electricity, gas, television, cable, internet access, etc.), telephone bills (including cell phone bills for you or members of your immediate family), credit card bills, bank account statements, insurance, magazines, personal correspondence and any other items of mail that you received in or pertaining to the months of May 2007 through October 2007.

8. Written evidence of any rent or any hotel bill that you paid or was paid in your name or behalf for the year 2006 through

September 2007.

9. Copies of all documents showing health care received by you or any member of your immediate family between November 23, 2005 and September 24, 2007, to include any and all doctors, dentists and/or hospital bills, insurance records, and any other evidence (canceled checks, appointment books, calendars, etc.) of visits to doctors, dentists, hospitals, or other health care providers.

10. Copies of all prescriptions for medication that you filled between November 23, 2005 and September 24, 2007. For each, please include the name and address of the Pharmacy filling the prescription.

11. Written evidence of any and all moving expenses incurred by you between June 1, 2007 and September 24, 2007.

/s/ Tedford Taylor
Attorney for Plaintiff

OF COUNSEL
TAYLOR & TAYLOR
2130 Highland Avenue
Birmingham, AL 35205
(205) 558-2800 - telephone
(205) 558-2860 - facsimile

CERTIFICATE OF SERVICE

I hereby certify that I have served a copy of the foregoing upon counsel of record, by US Mail, first class postage affixed, to the address listed below on this the _21st day of December, 2007.

R. Larry Bradford, Esq.
Bradford & Sears, PC
2020 Canyon Road
Suite 100
Birmingham, AL 35216

/s/ Tedford Taylor
Attorney for Plaintiff